

EXHIBIT 4

COPY

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

CASE NO.: 1:15-cv-5920

EUGENIE BOUCHARD,

Plaintiff,

-vs-

UNITED STATES TENNIS ASSOCIATION, INC., and USTA NATIONAL
TENNIS CENTER,

Defendants.

* * * * *

DEPOSITION OF: EVA SCHEUMANN

PURSUANT TO: Notice by Counsel for Plaintiff

DATE TAKEN: November 30, 2016

TIME: 10:06 a.m. to 1:26 p.m.

PLACE: Hilton St. Petersburg Bayfront
333 1st Street South
St. Petersburg, Florida 33701

REPORTED BY: Elizabeth W. Chorrushi
Registered Professional Reporter
Florida Professional Reporter
Notary Public
State of Florida at Large

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APPEARING ON BEHALF OF THE DEPONENT

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1 Q Where did you look when you went looking for
2 her?

3 A I went to the media center. I went to the gym,
4 and I went to the player lounge.

5 Q Okay. Now, when you are leaving the locker
6 room and you walk into the hallway --

7 A Mmm-hmm.

8 Q -- outside the locker room, which way is the
9 player lounge?

10 A To the left.

11 Q Do you recall if you went left first or right
12 first?

13 A Cannot remember.

14 Q Did you find Ms. Bouchard in the player lounge?

15 A No.

16 Q Did you find Ms. Bouchard in the gym?

17 A No.

18 Q You said that you went to look for her in the
19 media center?

20 A Well, the media area where -- I can't go in the
21 media center.

22 Q What is the media center?

23 A It's the area where the press conference rooms
24 are. I don't know if that's called media center. It's
25 our media area.



1 Q But she didn't do that?

2 A No.

3 Q Okay. And, in fact, you waited, what --

4 another about 11 -- well, 10 or so minutes before you
5 went and looked for her?

6 A Looked for her.

7 Q When you went to look for her, where did you
8 look?

9 A I went into the media area where the press
10 conference rooms are. I went to the gym and to the
11 player lounge.

12 Q Okay. Now, when you went to the -- is this all
13 on one level?

14 A No.

15 Q Okay. What's on a different level?

16 A Lounge, player lounge and gym.

17 Q How did you get to the player lounge?

18 A I go up one level.

19 Q Staircase?

20 A Yes.

21 Q And when you got up to the player lounge area,
22 did you see anyone?

23 A No. Nobody.

24 Q Was the light on in there? Was it light?

25 Dark?



1 **A** I remember it being dark.

2 **Q** Okay. And is it that same level where the gym
3 is?

4 **A** No. The gym is one more.

5 **Q** Okay. So did you go up another set of stairs?

6 **A** Yes.

7 **Q** And when you got up that second set of stairs,
8 did you see anything?

9 **A** No. Nobody.

10 **Q** Nobody at all?

11 **A** Nobody at all.

12 **Q** Was the gym dark?

13 **A** Yes.

14 **Q** Okay. So having gone to the second floor, to
15 the third floor and seeing that everything is dark and
16 there's no one there, did you then come back down --

17 **A** Yes.

18 **Q** -- to the first floor?

19 **A** Yes.

20 **Q** When you came back down to the first floor, did
21 you at that point determine that you can't find
22 Ms. Bouchard?

23 **A** Yes.

24 **Q** Okay. And in your experience as a trainer,
25 have you had instances where an athlete would tell you

